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8 Attorneys for Plaintiff AIG SPECIALTY INSURANCE COMPANY F/K/A CHARTIS  
SPECIALTY INSURANCE COMPANY AND ALSO AMERICAN INTERNATIONAL  
9 SPECIALTY LINES INSURANCE COMPANY

10  
11 UNITED STATES DISTRICT COURT  
12 DISTRICT OF NEVADA

13 AIG SPECIALTY INSURANCE COMPANY  
F/K/A CHARTIS SPECIALTY INSURANCE  
14 COMPANY AND ALSO AMERICAN  
15 INTERNATIONAL SPECIALTY LINES  
INSURANCE COMPANY, an Illinois  
16 Corporation,

17 Plaintiff,

18 vs.

19 LIBERTY MUTUAL FIRE INSURANCE  
20 COMPANY, a Massachusetts Corporation,

21 Defendant.

CASE NO. 2:17-cv-01260-APG-NJK

**STIPULATION AND [PROPOSED]  
ORDER TO CONTINUE DEADLINE TO  
FILE DISMISSAL PAPERS**

FIRST REQUEST

22  
23 Plaintiff AIG SPECIALTY INSURANCE COMPANY F/K/A CHARTIS SPECIALTY  
24 INSURANCE COMPANY AND ALSO AMERICAN INTERNATIONAL SPECIALTY LINES  
25 INSURANCE COMPANY (“AISLIC”) and Defendant LIBERTY MUTUAL FIRE INSURANCE  
26 COMPANY (“Liberty”) (collectively, the “Parties”), by and through their attorneys of record, and  
27 pursuant to Local Rules IA 6-1(a)(b)(c) and 6-2, hereby stipulate and agree as follows:

28 ///

1 WHEREAS the Parties previously submitted the Provisional Joint Stipulation and Proposed  
2 Order to Conduct Certain Depositions After the Existing Discovery Cut-Off Date in Light of  
3 Settlement (Doc 148) advising the court of their tentative settlement;

4 WHEREAS the court granted the Provisional Joint Stipulation and Proposed Order to  
5 Conduct Certain Depositions After the Existing Discovery Cut-Off Date in Light of Settlement and  
6 set a deadline of January 31, 2019 to file dismissal papers (Doc. 149);

7 WHEREAS the Parties have negotiated, exchanged and agreed to the form and content of a  
8 written settlement agreement and release;

9 WHEREAS additional time is needed before dismissal papers can be filed to obtain  
10 signatures to the settlement agreement and release and issue the settlement payment;

11 The Parties hereby stipulate and request that the deadline to file dismissal papers is extended  
12 30 days.

13 DATED: January 25, 2019

**HEROLD & SAGER**

14  
15 By: /s/ Nicholas B. Salerno

16 NICHOLAS B. SALERNO, ESQ., SBN 6118  
17 Attorneys for Plaintiff AIG SPECIALTY  
18 INSURANCE COMPANY F/K/A CHARTIS  
19 SPECIALTY INSURANCE COMPANY AND  
ALSO AMERICAN INTERNATIONAL  
SPECIALTY LINES INSURANCE COMPANY

20 DATED: January 25, 2019

**DUANE MORRIS LLP**

21  
22 By: /s/ Tyson E. Hafen

23 DOMINICA C. ANDERSON, ESQ., SBN 2988  
24 TYSON E. HAFEN, ESQ., SBN 13139  
25 Attorneys for Defendant LIBERTY MUTUAL  
FIRE INSURANCE COMPANY

26 **IT IS SO ORDERED:**

27 DATED: January 28, 2019

28   
UNITED STATES MAGISTRATE JUDGE